

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

SIERRA CLUB,)	
)	
Plaintiff,)	
)	
v.)	Civ. Action No. 3:10-cv-000303-bbc
)	
DAIRYLAND POWER COOPERATIVE,)	
)	
Defendant.)	
_____)	

MOTION FOR PROTECTIVE ORDER

For the reasons set forth in the accompanying memorandum, Defendant Dairyland Power Cooperative hereby moves for a protective order limiting the scope of Plaintiff Sierra Club's document requests. Pursuant to Federal Rule of Civil Procedure 26(c), Dairyland hereby certifies that the parties have conferred in a good faith attempt to resolve this dispute, and are unable to agree on the proper scope of discovery under Federal Rule of Civil Procedure 26(b).

Respectfully submitted this 4th day of October, 2010.

By: /s/Nash E. Long, III

Nash E. Long, III*
WINSTON & STRAWN LLP
214 N. Tryon Street
22nd Floor
Charlotte, NC 28202
Email: nlong@winston.com
(704) 350-7700
(704) 350-7800 ~ Fax

John M. Holloway, III*
Eric P. Gotting*
Elizabeth C. Williamson*
WINSTON & STRAWN LLP
1700 K Street, N.W.
Washington, D.C. 20006
Email: jholloway@winston.com
egotting@winston.com
ewilliamson@winston.com
(202) 282-5000
(202) 282-5100 ~ Fax

Jeffrey L. Landsman
WHEELER, VAN SICKLE & ANDERSON, S.C.
25 West Main Street, Suite 801
Madison, WI 53703
Email: JLandsman@wheelerlaw.com
(608) 255-7277
(608) 255-6006 ~ Fax

Attorneys for Dairyland Power Cooperative

**Admitted Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that I have electronically filed the foregoing **DEFENDANT'S MOTION FOR PROTECTIVE ORDER** with the Clerk of the Court using the CM/ECF system that will send notification of such filing automatically to all counsel of record.

David C. Bender
Christa O. Westerberg
Pamela R. McGillivray
MCGILLIVRAY WESTERBERG & BENDER, LLC
305 S. Paterson Street
Madison, WI 53703
Email: bender@mwattorneys.com
westerberg@mwattorneys.com
mcgillivray@mwattorneys.com

Elizabeth R. Lawton
MIDWEST ENVIRONMENTAL ADVOCATES, INC.
551 Main Street, Suite 200
Madison, WI 53703
Email: blawton@midwestadvocates.com

This 4th day of October, 2010.

/s/Nash E. Long, III

Nash E. Long, III*